



750 Third Avenue
New York, NY 10017-2703
(212) 687-8181
Fax: (212) 972-9432
www.kreindler.com

August 3, 2018

ECF/CM

The Honorable Edgardo Ramos
United States District Court
for the Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. Gammal*, 15 Cr. 588 (S.D.N.Y.) (ER)

Dear Judge Ramos:

Don Douboulay and I represent Ahmed el-Gammal who is currently scheduled to be sentenced by this Court on September 18, 2018. Some of the materials and information that we hope to include with our sentencing submission will take longer to obtain and prepare for presentation to the Court than originally anticipated. Having spoken to the individuals responsible for those materials, we believe an additional adjournment is necessary to allow us to fully present to this Court the information relevant to its sentencing determination.

I have asked the prosecutors for their position regarding this adjournment request and have been advised that they do not object. This is the third request for a sentencing adjournment.

In order to obtain the information and materials the defense believes are critical as this Court assesses the 18 U.S.C. § 3553(a) factors and ultimately fashions a sentence sufficient but not greater than necessary to accomplish the goals of the federal sentencing regime here, the defense respectfully asks that the sentencing be adjourned to a date at least one month after September 18, 2018.

Respectfully,

/s/ Megan W. Bennett

Cc: All counsel of record via ECF/CM

California Office

707 Wilshire Boulevard, Los Angeles, CA 90017-3613
Tel: (213) 622-6469 Fax: (213) 622-6019

Massachusetts Office

855 Boylston Street, Boston, MA 02116-2688
Tel: (617) 424-9100 Fax: (617) 424-9120